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May 1, 2008

VIA FACSIMILE  
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MEMO ENDORSED

Hon. Frank Maas  
United States Magistrate Judge  
United States District Court, SDNY  
500 Pearl Street, Room 740  
New York, New York 10017-1312

Re: Wang et. al. v. CYR International, Inc. et al., 07 Civil Action Number 05462  
(BSJ)(FM)

Dear Judge Mass:

We represent the Plaintiffs in the above referenced matter. I write this letter pursuant to the Court's April 18, 2008 Order directing Plaintiffs' counsel to update the Court as to the status of Defendants CYR International, Inc., CYR USA, Inc. and Chew Young Roo America Inc. ("CA Defendants") responses and production of documents that the Court directed be made by April 25, 2008.

On April 25, 2008 Plaintiffs received a package of documents including responses to Plaintiffs' interrogatories and requests for documents. Upon review of the documents, it appears that the CA Defendants have made reasonable first attempt to respond to Plaintiffs' interrogatories and have asked for some clarifications that Plaintiffs will provide and upon which Plaintiffs expect more complete responses; also, these responses do not include a sworn signature of the individuals providing the responses as required under the Rules which Plaintiffs expect Defendants will provide.

The CA Defendants' document production responsive to Plaintiffs' First Request for Production of Documents and Things appear to be very incomplete including (in particular) documents responsive to Plaintiffs' Requests No. 2, No. 5, No. 7, No. 8, No. 9, No. 12, No. 15, and No. 16.

Plaintiffs will discuss these deficiencies in detail with the CA Defendants' counsel (Daniel T. Hughes) over the next week and respectfully request that the Court

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direct the CA Defendants to cure these deficiencies within two (2) weeks at which time Plaintiffs will update the Court as to the status.

Respectfully submitted,

Dariush Keyhani

Dariush Keyhani

cc: via facsimile  
Daniel T. Hughes, Esq.  
Daniel K. Lee, Esq.

Application denied. I cannot direct anyone on the basis of generalities such as these. When you have a specific gripe, feel free to write again (after conferring with your adversary).

J. Maas, USMS,  
5/5/08

\* Admitted before the Southern, Eastern, and Western Districts of New York, New Jersey District Court and the New Jersey Bar-not a member of the NY State Bar